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Carol Hanlon
DOE
Office of Civilian
Radioactive Waste Management
PO Box 30307
North Las Vegas, NV 89036-0307

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Serena Rainey
Community Against Railroad Pollution
122 S. Coral
Rockaway Beach, OR 97136

Official Comments on Yucca Mountain Site Suitability

Dear Ms. Hanlon:

Transportation to the Yucca Mountain site poses too many dangers.

Chemical rail accidents have recently made the news as a threat to public health. The Agency for Toxic Substances and Disease Registry reported this year that spills from railroad cars pose more danger to the public than releases from trucks, because they are more likely to take place in densely populated areas and occur more often when residents are likely to be home. The Baltimore Sun reported that the rail cars in Baltimore's recent three-day hydrochloric acid train fire burned as high as 1,500 degrees Fahrenheit. NRC design criteria for high-level nuclear waste containers only require casks to be able to withstand temperatures of 1,475 degrees Fahrenheit. A number of radiation releases from railroad accidents have already occurred in the U.S. According to the Good Neighbor Project for Sustainable Industries' Hazardous Materials on the Rails report, a worst-case nuclear accident in the late 1990's could have necessitated the evacuation of a 42-mile radius -- a 5,000-square-mile area.

In 1997, the Federal Railroad Administration found a "fundamental breakdown" in the ability of Union Pacific Railroad to operate safely. Union Pacific lost its contract with the U.S. military as a result of the railroad's safety problems. Union Pacific employees have told me that most accidents, including derailments and collisions, go unreported, and I have witnessed railroad spills within a few yards of residences. In 2000, a coalition of eight railroad workers' unions brought complaints to the FRA of UP's intimidation of injured employees. The FRA found that supervisors had been falsifying the accident rate by telling workers that they might lose their jobs if they reported accidents in which they were involved, even preventing wounded employees from obtaining medical attention. The Eugene Register-Guard in 1993 quoted employees of Southern Pacific, which merged with Union Pacific three years later, as saying damaged cars were knowingly put back into service without being repaired, and repairs were recorded that were not made. A post merger FRA inspection found three in every eight rail cars to be "exceptions," and Union Pacific admits that 10 percent of its hazmat cars are defective, unlabeled or mislabeled. I have read in newspapers and heard from railroad employees about gaps and violations in many safety-related areas of UP's operations.

The route from Hanford to Yucca Mountain crosses difficult terrain. Some of the tracks run along cliffs, where rail cars and cargo have fallen in the past.

In a time of terrorism and war, to transport large amounts of highly radioactive material over a long period and a great distance, passing within one mile of about 60 million people, and relying on a carrier with well-known safety problems, would be an unacceptably risky approach to the problem of disposing of our country's nuclear waste.

Sincerely

Serena Rainey
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